

September 13, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: ET Docket No. 08-59, Amendment of the Commission's Rules to Provide  
Spectrum for the Operation of Medical Body Area Networks

Dear Ms. Dortch,

On January 13, 2011, Philips Healthcare ("Philips"), GE Healthcare ("GE") and the Aerospace and Flight Test Radio Coordinating Council ("AFTRCC") (together, the "Joint Parties") submitted to the Commission a comprehensive proposal agreed upon by the Joint Parties for resolving the spectrum sharing issues raised in ET Docket No. 08-59. Since that time the Joint Parties, together with the American Society for Healthcare Engineering of the American Hospital Association ("ASHE"), have engaged in several meetings with FCC staff to discuss the proposal and worked to refine the proposal and the draft rules proposal associated therewith.

As a result of this review, the Joint Parties and ASHE together submit the attachment containing recommended changes to the draft rules proposal. The recommended changes incorporate the issues discussed and additional refinements that have been accomplished over the past eight months. In addition, we understand that Special Temporary Authority (STA) requests sometimes are requested for temporary use of this spectrum by broadcasters and others, and we agree that broadcast and other STA requests should continue to be coordinated in this spectrum.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed in Docket ET 08-59.

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Respectfully Submitted,

/s/

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Attachment: Draft Rules Proposal